



June 18, 2025

Hon. Peggy Kuo
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

VIA ECF ONLY

Re: *Shkolir, et al. v. RX2GO, Inc., et. al.*; 1:23-cv-7256-OEM-PK (EDNY)
MOTION TO REQUEST TELEPHONIC CONFERENCE

Your Honor:

I represent the Plaintiffs in the above-referenced action. Pursuant to Your Honor's Order of June 9, 2025, the deadline to file a Motion for Settlement Approval is June 20, 2025.

The parties still do not have a finalized agreement ready to submit for approval due to counsels' disagreements as to certain terms.

Plaintiffs' counsel requests that a phone conference be scheduled to discuss the settlement agreement. Defense counsel objects to this as he thinks it is unnecessary. Plaintiffs' counsel proposes that a phone conference be set for 2-3 weeks out so that if we are in fact able to resolve our differences before then we can let the court know and file our motion to approve instead. (For scheduling, Plaintiffs' counsel notes that she is out of country and unavailable July 11-21).

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink that reads "Penn Dodson". The signature is fluid and cursive, with a long horizontal stroke at the end.

Penn Dodson, Esq.

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